

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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PAUL CULBERTSON, KATHY NEAL, :
KELLY ALLISON-PICKERING, JESSICA :
HAIMAN, ALEXANDER CABOT, BRIANA :
JULIUS, NICHELLE NEWLAND, :
BERNADETTE NOLEN, ALEXANDREA : **CASE NO. 1:20-cv-3962-LJL**
POLICHENA, and MARK NIEDELSON, :
individually and on behalf of all others similarly :
situated, :
Plaintiffs, : **JUDGE LEWIS J. LIMAN**
: :
-v- :
DELOITTE CONSULTING LLP, :
Defendant. :
----- X

**PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION
SETTLEMENT, PRELIMINARY CERTIFICATION OF SETTLEMENT CLASS, AND
APPROVAL OF NOTICE PLAN**

Pursuant to Rule 23 of the Federal Rules of Civil Procedure, Plaintiffs Paul Culbertson, Kathy Neal, Kelly Allison-Pickering, Alexander Cabot, Briana Julius, Nichelle Newland, Bernadette Nolen, Alexandra Polichena, and Mark Niedelson (collectively, "Plaintiffs"), individually and on behalf of all others similarly situated, hereby move this Court for preliminary approval of the proposed class action settlement. In support thereof, Plaintiffs rely upon the accompanying Memorandum in Support of Motion for Preliminary Approval of Class Action Settlement, Preliminary Certification of Settlement Class, and Approval of Notice Plan; the Declaration of Jeffrey S. Goldenberg ("Goldenberg Decl."); the Declaration of Steven Weisbrot, Esq. of Angeion Group, LLC Re: The Proposed Notice Plan; and the Settlement Agreement (and exhibits thereto) which is attached to the Goldenberg Decl. as Exhibit A filed contemporaneously

with this Motion; the records, pleadings, and papers filed in this action; and such other documentary and oral evidence or argument as may be presented to the Court at or prior to the hearing of this Motion.

Dated: August 18, 2021

Respectfully submitted,

By: /s/Frederic S. Fox

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*Admitted *Pro Hac Vice*

***Pro Hac Vice* Motion forthcoming

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of August, 2021, I caused a true and correct copy of the foregoing **PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT, PRELIMINARY CERTIFICATION OF SETTLEMENT CLASS, AND APPROVAL OF NOTICE PLAN** with the Clerk of the Court for the Southern District of New York via the Court's CM/ECF system, which will send notification of such filing to the counsel of record in the above-captioned matters.

Date: August 18, 2021

/s/ Frederic S. Fox
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